

Remedium

Robert J. Medler
Director
Remedium Group, Inc.

September 14, 2009

U.S. Environmental Protection Agency
EPR-SR
1595 Wynkoop Street
Denver, CO 80202

A Subsidiary of W. R. Grace & Co.
6401 Poplar Ave., Suite 301
Memphis, TN 38119-4840

Tel: (901) 820-2024
Fax: (901) 820-2061
Email: Robert.J.Medler@grace.com

Attn.: Ms. Bonita Lavelle

Subject: OU3 RI/FS of the Libby Asbestos Site
Monthly Progress Report – August 2009

Dear Bonnie:

This progress report describes work completed during the month of August 2009, in accordance with Section IX of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study dated September 2007. A discussion of the actions taken, sampling results, planned activities, modifications, problems encountered, potential issues, anticipated delays, and solutions developed is provided below. Information by contractor is reported separately.

MWH

The following is a summary of the actions taken and progress made during the month of August.

A. ACTIONS TAKEN

The following is a summary of the actions taken and progress made during August, 2009.

- Continued to collect surface water flow data from ISCO automatic samplers/flow sensors at LRC-06, LRC-02 and CC-02.
- Because most of the air samples collected under Attachment A of the Final Phase III activity-based sampling (ABS) SAP were reported by the analytical laboratory to be overloaded with dust, pilot testing of lower pumping rates, modified activity durations and other modifications to the sampling protocol were conducted during the weeks of August 10 – 14 and August 17 – 21.
- ABS under Revision 3 of Attachment A of the Phase III SAP began on August 24 and has been completed for 2 rounds.

B. SAMPLING RESULTS

Pilot testing of the revised ABS script and decreased air flow rates was performed under Revision 3 of Attachment A of the SAP, issued by EPA on August 6, 2009. Evaluation of the air sampling cassettes by Hygeia Laboratories indicated that most samples collected under revised flow rates and activity durations could be analyzed directly. Samples from Round 1 of the ABS Script have been analyzed and reported.

C. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months.

- Continue ABS under Revision 3 of Attachment A of the Phase III SAP.
- Participate in teleconferences and other meetings as requested by EPA.

D. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL ISSUES/ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

Overloading of air sample cassettes at the pumping rates specified in the Final SAP would require indirect preparation and would result in high analytical sensitivity concentrations. Pilot testing of modified flow rates, activity durations and sampling procedures under Revision 3 of Attachment A of the SAP produced samples that can be directly prepared by the analytical laboratory.

Parametrix

The following is a summary of the actions taken and progress made during the month of August.

A. ACTIONS TAKEN

- Finalized remaining Phase III SAP small mammal SOPs;
- Obtained scientific collection permit and IACUC application approvals;
- Finalized small mammal reconnaissance memorandum and submitted to Remedium and EPA;
- Mobilized for small mammal program;
- Initiated and completed small mammal field and necropsy program in Libby, Montana;
- Financial, project management and supervision.

B. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months:

- Complete small mammal field and necropsy program in Libby, Montana;
- Submit costs on 2009 fish and macroinvertebrate field program to Remedium;
- Finalize remaining Phase III SAP aquatic program SOPs and submit to Remedium and EPA;
- Finish demobilization activities for small mammal program;

- Upload small mammal field notebook, chains of custody and necropsy notebook data to EPA database;
- Mobilize for aquatic (fish and macroinvertebrate) field program;
- Initiate conduct of aquatic field program in Libby, Montana;
- Initiate small mammal tissue histological preparation and analysis (Northwest ZooPath);
- Discuss aquatic bioassay issues with BTAG;
- Prepare aquatic bioassay protocol for review by Remedium, EPA;
- Initiate aquatic bioassay(s).

C. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL ISSUES/
ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

- Only a single small mammal species (*Peromyscus maniculatus*) was trapped during initial conduct of small mammal program (red back voles were not encountered at the reference or OU3 trap locations). Issue discussed with Remedium and EPA.
- Need to resolve asbestos fiber issue concerns regarding rainbow trout bioassay to allow initiation of pilot study.

Sincerely,



Robert J. Medler
Project Coordinator
Remedium Group, Inc.

cc: Michael DeDen - MWH
Lynne Gardner
John Garr - MWH
Robert Marriam
Sue Robinson - Parametrix
Dick Sloan - Montana DEQ